

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Akan-Yene William Etuk

Write the full name of each plaintiff.

24 CV 04962

(Include case number if one has been assigned)

-against-

The City of New York.

**COMPLAINT**

Do you want a jury trial?

Yes  No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

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## I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

**Federal Question**

**Diversity of Citizenship**

### A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

SEE ATTACHED

---



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---

### B. If you checked Diversity of Citizenship

#### 1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, AKANIJENG WILLIAM EMK is a citizen of the State of  
(Plaintiff's name)

New York

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

---

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, The City of New York, is a citizen of the State of  
 (Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

The City of New York.

If the defendant is a corporation:

The defendant, The City of New York is incorporated under the laws of  
 the State of New York

and has its principal place of business in the State of \_\_\_\_\_

or is incorporated under the laws of (foreign state) \_\_\_\_\_

and has its principal place of business in \_\_\_\_\_.

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Akanyene W Erik  
 First Name Middle Initial Last Name

2402 ATLANTIC AVENUE #04  
 Street Address

Brooklyn NY 11233  
 County, City State Zip Code

(929) 676-0970  
 Telephone Number Email Address (if available)

United State District Court

**United States District Court**

**Southern District of New York**

500 Pearl Street

New York, NY 10007

**Akaniyene William Etuk**

2402 Atlantic Avenue

Brooklyn, New York, 11233

awetuk001@gmail.com

1(818) 485-9411 / 1(929) 676-0970

**Pro Se Plaintiff**

**UNITED STATES DISTRICT COURT**

**SOUTHERN DISTRICT OF NEW YORK**

**Akaniyene William Etuk,**

**Plaintiff,**

v.

**The City of New York,**

**New York City Police Department, et al.,**

**Defendants.**

Case No.: \_\_\_\_\_

## United State District Court

**COMPLAINT****Introduction**

1. This is a civil rights action brought by Plaintiff, Akaniyene William Etuk, against officers of the New York City Police Department ("NYPD") for violations of Plaintiff's constitutional rights, including the right to travel, the right to privacy, protection against unreasonable searches and seizures, and violations of the Americans with Disabilities Act ("ADA").
2. Pursuant to New York General Municipal Law Section 50-e, the proper defendant in any legal action involving the NYPD is the City of New York. The City of New York, located at 100 Church Street, New York, NY 10007, is therefore named as the defendant in this lawsuit. Phone: (212) 356-1000. Fax: (212) 356-1148.

**Jurisdiction and Venue**

3. This Court has jurisdiction over this action under 28 U.S.C. § 1331 (federal question jurisdiction) and 42 U.S.C. § 1983 (civil action for deprivation of rights).
4. Venue is proper in the Southern District of New York under 28 U.S.C. § 1391(b) because the events giving rise to this claim occurred in this district.

**Parties**

5. Plaintiff, Akaniyene William Etuk, is a resident of Brooklyn, New York, who was at the time of the incident residing in the Bronx, New York.

United State District Court

6. Defendant, **The City of New York**, is a municipal corporation located at 100 Church Street, New York, NY 10007. The New York City Police Department is an agency of the City of New York.
7. Defendant Officer Frias, shield number 30952, is an officer of the NYPD involved in the events described herein.

**Facts**

8. On August 30, 2023, at approximately 6:34 PM, Officer Frias and several other NYPD officers stopped Plaintiff on a train platform without Plaintiff's permission, contractual agreement, or being a crime victim.
9. Plaintiff was accompanied by a registered service animal providing essential services at the time of the stop. The service animal was registered and vaccinated at the time, and a copy of the service animal registration and vaccination papers are attached as Exhibits B and C, respectively.
10. Officers of the NYPD stopped Plaintiff without a contract, thereby violating Plaintiff's right to travel.
11. Officers of the NYPD, without a contract, forced Plaintiff to identify himself, violating Plaintiff's right to privacy.
12. Officers of the NYPD made legal determinations without possessing a license to practice law.
13. Officers of the NYPD did not show their identification cards to verify themselves as registered policemen.

## United State District Court

14. Officers of the NYPD approached Plaintiff with guns, under threat, duress, and coercion, attempting to force Plaintiff to sign an offer of contract (CJTN 70425074/NYSID 16037193M, which was registered and dismissed in court under case #B23637196). A copy of the dismissal certificate is attached as Exhibit A.
15. Officers of the NYPD used excessive force, causing pain and injury, before placing Plaintiff in handcuffs.
16. Officers of the NYPD transported Plaintiff to a different location from his intended point of travel, where Plaintiff's prints were taken without his consent or contractual agreement.
17. Defendants' actions in stopping and arresting Plaintiff and his registered service animal, who was providing essential services at the time, constituted discrimination under the Americans with Disabilities Act (ADA).
18. There is no evidence that these officers signed an oath to "We the People."
19. There is no evidence that these officers are legitimate police or policy enforcers for the original republic.
20. There is no evidence that these officers are not working for a foreign corporation.

**Claims for Relief****Count I: Violation of the Right to Travel**

21. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-20 as though fully set forth herein.
22. Defendants' actions on August 30, 2023, violated Plaintiff's right to travel freely within the United States.

United State District Court

**Count II: Violation of the Right to Privacy**

23. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-20 as though fully set forth herein.

24. Defendants' actions in forcing Plaintiff to identify himself without justification violated Plaintiff's right to privacy.

**Count III: Unauthorized Legal Determinations**

25. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-20 as though fully set forth herein.

26. Defendants made legal determinations without possessing a license to practice law.

**Count IV: Failure to Identify as Police Officers**

27. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-20 as though fully set forth herein.

28. Defendants did not show their identification cards to verify themselves as registered policemen.

**Count V: Excessive Force**

29. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-20 as though fully set forth herein.

30. Defendants used excessive force against Plaintiff, causing pain and injury, before placing Plaintiff in handcuffs.

United State District Court

**Count VI: Unlawful Transport and Processing**

31. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-20 as though fully set forth herein.
  
32. Defendants transported Plaintiff to a different location and processed Plaintiff's prints without his consent or contractual agreement.

**Count VII: Violation of ADA**

33. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-20 as though fully set forth herein.
  
34. Defendants violated the Americans with Disabilities Act (ADA) by stopping and arresting Plaintiff and his registered service animal, who was providing essential services at the time.

**Count VIII: Violation of Oath to "We the People"**

35. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-20 as though fully set forth herein.
  
36. Defendants did not sign an oath to "We the People," as required.

**Count IX: Impersonation as Legitimate Police**

37. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-20 as though fully set forth herein.
  
38. Defendants are not legitimate police or policy enforcers for the original republic.

## United State District Court

**Count X: Employment by a Foreign Corporation**

39. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-20 as though fully set forth herein.

40. Defendants are working for a foreign corporation.

**Prayer for Relief**

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in his favor and against Defendants, and award Plaintiff:

- A. One million dollars (\$1,000,000.00) for each violation of Plaintiff's constitutional rights, ADA violations, and other legal standards;
- B. One million dollars (\$1,000,000.00) for each violation involving Plaintiff's service animal;
- C. Punitive damages in an amount to be determined at trial;
- D. Declaratory relief stating that Defendants' actions violated Plaintiff's constitutional rights, ADA, and other legal standards;
- E. Injunctive relief preventing Defendants from engaging in similar conduct in the future;
- F. Reasonable attorney's fees and costs of this action;
- G. Such other and further relief as the Court deems just and proper.

**Judge Demand**



Animal  
Care Centers  
of NYC

## Reunification Form

326 East 110th Street  
New York NY 10029  
212-788-4000

### Agent / Owner's Details

Person ID: 138876  
Receipt #: 249314  
Receipt Date: 7/12/2023

Person Name: Akaninyene Eink  
Person Address: 1923 Mc Donald Avenue APT 167  
BROOKLYN NY 11223  
Home Phone:  
Mobile Phone: 818 489 9411  
Email: awetuk01@gmail.com

### Animal Details:

	Animal ID	Name	Type	Mixed	Color(1)	Color(2)
1	176452	Veillee	Dog	Yes	Black Brown	
	Gender	Spayed / Neutered	Age	Incoming Date	License fee	
	Female	No	3 Years	6-Jul-2023		

### Reunification Details:

Item	Amount

### Products / Services:

Product / Service	Date	Quantity	Price Each
Microchip Implantation		1	\$0.00
Microchip Implantation		1	\$0.00
Bordetella Vaccine		1	\$15.00
DA2PP Vaccine		1	\$15.00
Dewormer Treatment		1	\$12.00
Medical Exam		1	\$30.00
NYC Dog Licence, unaltered [LICU]		1	\$34.00
Rabies Vaccine		1	\$15.00
Restoration/Redemption Fee		1	\$3.00
<b>Total products / services fee included in payment details below:</b>			<b>\$124.00</b>

### Payment Details:

Fee	Amount
Fee	\$0.00
Reunification	\$0.00
Dog License	\$0.00
	<b>Amount Paid \$0.00</b>

### Notes:

Entered By:456 991311 Printed By:456 991311 Printed On:Jul 12 2023 10:10AM

### Reunification Agreement:

REUNIFICATION CONTRACT

[To Animal Details](#)[To Kennel Card](#)[Main Search Page](#)[Switch to Current Address](#)[Print Form](#)Animal  
Care Centers  
of NYC

## Agency Receipt

326 East 110th Street  
New York NY 10029  
212-788-4000Person Details

Person Name: Police 52nd Precinct Police-52nd Precinct

Person Address: 3016 Webster Avenue  
Bronx NY 10467

Home Phone:

Mobile/Phone: 718 220 5811

Email:

Identification Type:

ID Number:

Person ID: 5951  
Receipt #: 285399  
Receipt Date: 5/25/2024Animal Details

Animal ID	Name	Type	Mixed	Color(1)	Color(2)
1 153814	Veillee	Dog	Yes	Black	Tan
Gender	Spayed / Neutered	Age	Primary Microchip #	Rabies Tag	Date In / Found
Female	No	3 Years 8 Months 3 Weeks (approx)	985113005559199	23-278818	25-May-2024

Payment Details:

Fee	Amount
Amount Paid	\$0.00

Notes:

Jurisdiction: Bronx

Entered By:1582 992296 Printed By:1582 992296 Printed On:May 25 2024 9:47PM Entered By User ID:1582

Conditions:

ACC's Surrender Prevention program can help you keep your pet! This program can provide you with information about free or low-cost veterinary care, pet food, behavior training, and more. Would you like to speak with an Admissions Counselor for more information?  YES  NO

PLEASE CONSIDER CAREFULLY

ANIMALS SURRENDERED TO ACC ARE CAREFULLY EVALUATED BASED ON AVAILABLE MEDICAL AND BEHAVIOR INFORMATION FOR ADOPTION, TRANSFER TO A RESCUE PARTNER, OR EUTHANASIA (HUMANELY PUT TO DEATH) AT THE SOLE DISCRETION OF ACC.

In consideration of Animal Care Centers of New York City ("ACC") accepting the animal described herein ("this animal"), I understand and agree as follows (please initial each section):

ACC does not guarantee that this animal will be adopted by a member of the public or transferred to a rescue partner. I understand that the length of time the animal may be held and the outcome, including adoption or humane euthanasia, is solely ACC's decision.

ACC may require that questions or other requests regarding the outcome of this animal be made in writing.

If this animal has bitten a person or animal, I will inform ACC.



**Animal  
Care Centers  
of NYC**

**2336 Linden Boulevard  
Brooklyn NY 11208  
212-788-4000**

## Vet Treatment History

## Owner Details

**Akaniyene Etuk  
1923 McDonald Avenue APT 167  
BROOKLYN NY 11223**

818 485 9411

## Animal Details

**Name:** Veilee  
**Type:** Dog  
**Mixed:** Yes  
**Color(1):** Unknown (update later)  
**Gender:** Female  
**Spayed / Neutered:** Unknown  
**Age:** 10 Months

This is to confirm that our records show that the animal described above has had the following vaccinations and treatments administered:

Vet Treatment Type	Date Given	Type	Expiration Date	Route Of Admin	Result	Vet	License #
1 Rabies Vaccine	22-Oct-2022	Killed				VET-P 991234	NY-010887

Vet Signature:

Date: 10/22/2022 1:19:00 PM

Dr. Michelle Lagones

I have a USA Service Dog  
 My dog is a medical alert dog  
 My dog is a hearing dog  
 My dog is a service dog  
 My dog is a support dog  
 My dog is a therapy dog  
 My dog is a emotional support dog  
 My dog is a facility dog  
 My dog is a medical response dog  
 My dog is a search and rescue dog  
 My dog is a working dog  
 My dog is a psychiatric service dog  
 My dog is a mobility assistance dog  
 My dog is a medical detection dog  
 My dog is a medical alert dog  
 My dog is a hearing dog  
 My dog is a service dog  
 My dog is a support dog  
 My dog is a therapy dog  
 My dog is an emotional support dog  
 My dog is a facility dog  
 My dog is a medical response dog  
 My dog is a search and rescue dog  
 My dog is a working dog  
 My dog is a psychiatric service dog  
 My dog is a mobility assistance dog  
 My dog is a medical detection dog



### MY ACCOUNT

[Print](#)

### HANDLER INFO

Akaninyone Elkuk  
1923 McDonald Avenue #101, Brooklyn,  
NY, 11223  
Email:  
polyphonicsystems@gmail.com  
Phone: 2125630546



### REGISTERED ANIMALS



Animal #1: Valley  
Breed: Rottweiler  
Type: Service Dog

Handler: Akaninyone Elkuk  
1923 McDonald Avenue #101,  
Brooklyn, NY, 11223  
Training Status: My Dog Is  
Trained Service animal  
m | 2125630546

Registration: 1009076684  
Service Medical Alert

[Have a hearing dog question?](#)

[How to make my dog Seizure](#)

[Forgot my registration number?](#)





## BRONX CRIMINAL COURT

265 E 161 Street, Bronx, NY 10451

FEE

Non-Public  
Version

Court ORI: NY062033J

The People of the State of New York  
vs.  
Akaniyene W. Etuk

**Certificate of Disposition**  
Docket Number: CR-020431-23BX

CJTN: 70425074M  
NYSID: 16037193M

Defendant DOB: 01/08/1977

Arrest Date: 08/30/2023 Arraignment Date: 09/19/2023

THIS IS TO CERTIFY that the undersigned has examined the files of the Bronx Criminal Court concerning the above entitled matter and finds the following:

Count #	Charge	Charge Weight	Disposition	Disposition Date
1	PL 205.30 AM Resisting Arrest **SEALED 160.50**	AM	Dismissed (Speedy Trial (CPL 170.30 (1)(e)), Sealed 160.50)	01/03/2024
2	PL 140.10 0A BM Crim Trespass 3rd;Enclsd Prop **SEALED 160.50**	BM	Dismissed (Speedy Trial (CPL 170.30 (1)(e)), Sealed 160.50)	01/03/2024
3	PL 140.05 V Trespass **SEALED 160.50**	V	Dismissed (Speedy Trial (CPL 170.30 (1)(e)), Sealed 160.50)	01/03/2024
4	PL 240.20 01 V Dis/Con:Fight/Violent Behavior **SEALED 160.50**	V	Dismissed (Speedy Trial (CPL 170.30 (1)(e)), Sealed 160.50)	01/03/2024

Charge Weight Key: I=Infraction; V=Violation; AM, BM=Class Misdemeanor; UM=Unclassified Misdemeanor; AF, BF, CF, DF, EF=Class Felony

Dated: January 19, 2024
  
Chief Clerk/Clerk of the Court

CAUTION: THIS DOCUMENT IS NOT OFFICIAL UNLESS EMBOSSED WITH THE COURT SEAL

All marijuana convictions under PL 221.05, PL 221.10, PL 221.15, PL 221.20, PL 221.35 or PL 221.40—including any appearing on this certificate of disposition—are vacated, dismissed, sealed, and expunged. It is an unlawful discriminatory practice for any entity to make any inquiry about such an expunged conviction or to use such an expunged conviction adversely against an individual in any form of application or otherwise—unless specifically required or permitted to do so by statute. It shall be an unlawful discriminatory practice, unless specifically required or permitted by statute, for any person, agency, bureau, corporation or association, including the state and any political subdivision thereof, to make any inquiry about, whether in any form of application or otherwise, or to act upon, adversely to the individual involved, any arrest or criminal accusation of such individual not then pending against that individual which was followed by a termination of that criminal action or proceeding in favor of such individual, as defined in subdivision two of section 160.50 of the criminal procedure law, or by an order adjourning the criminal action in contemplation of dismissal, pursuant to section 170.55, 170.56, 210.46, 210.47, or 215.10 of the criminal procedure law, or by a youthful offender adjudication, as defined in subdivision one of section 720.35 of the criminal procedure law, or by a conviction for a violation sealed pursuant to section 160.55 of the criminal procedure law or by a conviction which is sealed pursuant to section 160.59 or 160.58 of the criminal procedure law, in connection with the licensing, housing, employment, including volunteer positions, or providing of credit or insurance to such individual; provided, further, that no person shall be required to divulge information pertaining to any arrest or criminal accusation of such individual not then pending against that individual which was followed by a termination of that criminal action or proceeding in favor of such individual, as defined in subdivision two of section 160.50 of the criminal procedure law, or by an order adjourning the criminal action in contemplation of dismissal, pursuant to section 170.55 or 170.56, 210.46, 210.47 or 215.10 of the criminal procedure law, or by a youthful offender adjudication, as defined in subdivision one of section 720.35 of the criminal procedure law, or by a conviction for a violation sealed pursuant to section 160.55 of the criminal procedure law, or by a conviction which is sealed pursuant to section 160.58 or 160.59 of the criminal procedure law. An individual required or requested to provide information in violation of this subdivision may respond as if the arrest, criminal accusation, or disposition of such arrest or criminal accusation did not occur. The provisions of this subdivision shall not apply to the licensing activities of governmental bodies in relation to the regulation of guns, firearms and other deadly weapons or in relation to an application for employment as a police officer or peace officer as those terms are defined in subdivisions thirty-three and thirty-four of section 1.20 of the criminal procedure law; provided further that the provisions of this subdivision shall not apply to an application for employment or membership in any law enforcement agency with respect to any arrest or criminal accusation which was followed by a youthful offender adjudication, as defined in subdivision one of section 720.35 of the criminal procedure law, or by a conviction for a violation sealed pursuant to section 160.55 of the criminal procedure law, or by a conviction which is sealed pursuant to section 160.58 or 160.59 of the criminal procedure law. For purposes of this subdivision, an action which has been adjourned in contemplation of dismissal, pursuant to section 170.55 or 170.56, 210.46, 210.47 or 215.10 of the criminal procedure law, shall not be considered a pending action, unless the order to adjourn in contemplation of dismissal is revoked and the case is restored to the calendar for further prosecution. [Executive Law 296(16)]

Charges may not be the same as the original arrest charges.

United State District Court

Plaintiff demands a trial by a judge on all issues so triable.

**Exhibits**

- Exhibit A: Copy of Dismissal Certificate
- Exhibit B: Copy of Service Animal Registration
- Exhibit C: Copy of Service Animal Vaccination Papers

Dated: //\_\_\_\_\_

**Respectfully submitted,**

Akaniyene William Etuk

Plaintiff, Pro Se

2402 Atlantic Avenue

Brooklyn, New York, 11233

awetuk001@gmail.com

1(818) 485-9411 / 1(929) 676-0970

United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Akaniyene William Etuk**

2402 Atlantic Avenue  
Brooklyn, New York, 11233  
awetuk001@gmail.com  
1(818) 485-9411 / 1(929) 676-0970

**Pro Se Plaintiff**

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

**Akaniyene William Etuk,**

Plaintiff,

v.

**New York City Police Department, et al.,**  
Defendants.

**Case No.: \_\_\_\_\_**

**COMPLAINT**

## **Introduction**

1. This is a civil rights action brought by Plaintiff, Akaniyene William Etuk, against officers of the New York City Police Department ("NYPD") for violations of Plaintiff's constitutional rights, including the right to travel, the right to privacy, protection against unreasonable searches and seizures, and violations of the Americans with Disabilities Act ("ADA").

## **Jurisdiction and Venue**

2. This Court has jurisdiction over this action under 28 U.S.C. § 1331 (federal question jurisdiction) and 42 U.S.C. § 1983 (civil action for deprivation of rights).
3. Venue is proper in the Southern District of New York under 28 U.S.C. § 1331(b) because the events giving rise to this claim occurred in this district.

## **Parties**

4. Plaintiff, Akaniyene William Etuk, is a resident of Brooklyn, New York who was at the time of incident residing in the Bronx, New York .
5. Defendant, New York City Police Department, is a municipal agency located at 1 Police Plaza, New York, NY 10038.
6. Defendant Officer Frias, shield number 30952, is an officer of the NYPD involved in the events described herein.

## **Facts**

*Etuk 20F8*

7. On August 30, 2023, at approximately 6:34 PM, Officer Frias and several other NYPD officers stopped Plaintiff on a train platform without Plaintiff's permission, contractual agreement, or being a crime victim.
8. Plaintiff was accompanied by a registered service animal providing essential services at the time of the stop. The service animal was registered and vaccinated at the time, and a copy of the service animal registration and vaccination papers are attached as Exhibits B and C, respectively.
9. Officers of the NYPD stopped Plaintiff without a contract, thereby violating Plaintiff's right to travel.
10. Officers of the NYPD, without a contract, forced Plaintiff to identify himself, violating Plaintiff's right to privacy.
11. Officers of the NYPD made legal determinations without possessing a license to practice law.
12. Officers of the NYPD did not show their identification cards to verify themselves as registered policemen.
13. Officers of the NYPD approached Plaintiff with guns, under threat, duress, and coercion, attempting to force Plaintiff to sign an offer of contract (CJTN 70425074/NYSID 16037193M, which was registered and dismissed in court under case #B23637196). A copy of the dismissal certificate is attached as Exhibit A.
14. Officers of the NYPD used excessive force, causing pain and injury, before placing Plaintiff in handcuffs.

15. Officers of the NYPD transported Plaintiff to a different location from his intended point of travel, where Plaintiff's prints were taken without his consent or contractual agreement.
16. Defendants' actions in stopping and arresting Plaintiff and his registered service animal, who was providing essential services at the time, constituted discrimination under the Americans with Disabilities Act (ADA).
17. There is no evidence that these officers signed an oath to "We the People."
18. There is no evidence that these officers are legitimate police or policy enforcers for the original republic.
19. There is no evidence that these officers are not working for a foreign corporation.

### **Claims for Relief**

#### **Count I: Violation of the Right to Travel**

20. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.
21. Defendants' actions on August 30, 2023, violated Plaintiff's right to travel freely within the United States.

#### **Count II: Violation of the Right to Privacy**

22. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.
23. Defendants' actions in forcing Plaintiff to identify himself without justification violated Plaintiff's right to privacy.

**Count III: Unauthorized Legal Determinations**

24. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.

25. Defendants made legal determinations without possessing a license to practice law.

**Count IV: Failure to Identify as Police Officers**

26. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.

27. Defendants did not show their identification cards to verify themselves as registered policemen.

**Count V: Excessive Force**

28. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.

29. Defendants used excessive force against Plaintiff, causing pain and injury, before placing Plaintiff in handcuffs.

**Count VI: Unlawful Transport and Processing**

30. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.

31. Defendants transported Plaintiff to a different location and processed Plaintiff's prints without his consent or contractual agreement.

**Count VII: Violation of ADA**

32. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.

33. Defendants violated the Americans with Disabilities Act (ADA) by stopping and arresting Plaintiff and his registered service animal, who was providing essential services at the time.

**Count VIII: Violation of Oath to "We the People"**

34. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.

35. Defendants did not sign an oath to "We the People," as required.

**Count IX: Impersonation as Legitimate Police**

36. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.

37. Defendants are not legitimate police or policy enforcers for the original republic.

**Count X: Employment by a Foreign Corporation**

38. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.

39. Defendants are working for a foreign corporation.

**Prayer for Relief**

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in his favor and against Defendants, and award Plaintiff:

- A. One million dollars (\$1,000,000.00) for each violation of Plaintiff's constitutional rights, ADA violations, and other legal standards;
- B. One million dollars (\$1,000,000.00) for each violation involving Plaintiff's service animal;
- C. Punitive damages in an amount to be determined at trial;
- D. Declaratory relief stating that Defendants' actions violated Plaintiff's constitutional rights, ADA, and other legal standards;
- E. Injunctive relief preventing Defendants from engaging in similar conduct in the future;
- F. Reasonable attorney's fees and costs of this action;
- G. Such other and further relief as the Court deems just and proper.

#### **Judge Demand**

Plaintiff demands a trial by a judge on all issues so triable.

#### **Exhibits**

- Exhibit A: Copy of Dismissal Certificate
- Exhibit B: Copy of Service Animal Registration
- Exhibit C: Copy of Service Animal Vaccination Papers

Dated: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Respectfully submitted,

---

Akaniyene William Etuk

Plaintiff, Pro Se

2402 Atlantic Avenue

Brooklyn, New York, 11233

awetuk001@gmail.com

1(818) 485-9411 / 1(929) 676-0970

Etuk 8 OF 8



Animal  
Care Centers  
of NYC

## Reunification Form

326 East 110th Street  
New York NY 10029  
212-788-4000

### Agent / Owner's Details

Person ID: 138876  
Receipt #: 249314  
Receipt Date: 7/12/2023

Person Name: Akaninyene Eink  
Person Address: 1923 Mc Donald Avenue APT 167  
BROOKLYN NY 11223  
Home Phone:  
Mobile Phone: 818 489 9411  
Email: awetuk01@gmail.com

### Animal Details:

Animal ID	Name	Type	Mixed	Color(1)	Color(2)
1 176452	Veillee	Dog	Yes	Black Brown	
Gender	Spayed / Neutered	Age	Incoming Date	License fee	
Female	No	3 Years	6-Jul-2023		

### Reunification Details:

Item	Amount

### Products / Services:

Product / Service	Date	Quantity	Price Each
Microchip Implantation		1	\$0.00
Microchip Implantation		1	\$0.00
Bordetella Vaccine		1	\$15.00
DA2PP Vaccine		1	\$15.00
Dewormer Treatment		1	\$12.00
Medical Exam		1	\$30.00
NYC Dog Licence, unaltered [LICU]		1	\$34.00
Rabies Vaccine		1	\$15.00
Restoration/Redemption Fee		1	\$3.00

Total products / services fee included in payment details below: \$124.00

### Payment Details:

Fee	Amount
Reunification	\$0.00
Dog License	\$0.00
	Amount Paid \$0.00

#### Notes:

Entered By:456 991311 Printed By:456 991311 Printed On:Jul 12 2023 10:10AM

### Reunification Agreement:

REUNIFICATION CONTRACT

[To Animal Details](#)[To Kennel Card](#)[Main Search Page](#)[Switch to Current Address](#)[Print Form](#)Animal  
Care Centers  
of NYC

## Agency Receipt

326 East 110th Street  
New York NY 10029  
212-788-4000Person Details

Person Name: Police 52nd Precinct Police 52nd Precinct

Person Address: 3016 Webster Avenue  
Bronx NY 10467

Home Phone:

Mobile Phone: 718 220 5811

Email:

Identification Type:

ID Number:

Person ID: 5951  
Receipt #: 285399  
Receipt Date: 5/25/2024Animal Details

Animal ID	Name	Type	Mixed	Color(1)	Color(2)
1 153814	Veillee	Dog	Yes	Black	Tan
Gender	Spayed / Neutered	Age	Primary Microchip #	Rabies Tag	Date In / Found
Female	No	3 Years 8 Months 3 Weeks (approx)	985113005559199	23-278818	25-May-2024

Payment Details:

Fee	Amount
	\$0.00

Notes:

Jurisdiction: Bronx

Entered By:1582 992296 Printed By:1582 992296 Printed On:May 25 2024 9:47PM Entered By User ID:1582

Conditions:

ACC's Surrender Prevention program can help you keep your pet! This program can provide you with information about free or low-cost veterinary care, pet food, behavior training, and more. Would you like to speak with an Admissions Counselor for more information?  YES  NO

PLEASE CONSIDER CAREFULLY

ANIMALS SURRENDERED TO ACC ARE CAREFULLY EVALUATED BASED ON AVAILABLE MEDICAL AND BEHAVIOR INFORMATION FOR ADOPTION, TRANSFER TO A RESCUE PARTNER, OR EUTHANASIA (HUMANELY PUT TO DEATH) AT THE SOLE DISCRETION OF ACC.

In consideration of Animal Care Centers of New York City ("ACC") accepting the animal described herein ("this animal"), I understand and agree as follows (please initial each section):

ACC does not guarantee that this animal will be adopted by a member of the public or transferred to a rescue partner. I understand that the length of time the animal may be held and the outcome, including adoption or humane euthanasia, is solely ACC's decision.

ACC may require that questions or other requests regarding the outcome of this animal be made in writing.

If this animal has bitten a person or animal, I will inform ACC.



**Animal  
Care Centers  
of NYC**

**2336 Linden Boulevard  
Brooklyn NY 11208  
212-788-4000**

### Vet Treatment History

#### Owner Details

**Akaniyene Etuk  
1923 McDonald Avenue APT 167  
BROOKLYN NY 11223**

**818 485 9411  
818 485 9411**

#### Animal Details

**Name: Veilee  
Type: Dog  
Mixed: Yes  
Color(1): Unknown (update later)  
Gender: Female  
Spayed / Neutered: Unknown  
Age: 10 Months**

This is to confirm that our records show that the animal described above has had the following vaccinations and treatments administered:

Vet Treatment	Type	Date Given	Type	Expiration Date	Route Of Admin	Result	Vet	License #
<b>1</b> Rabies Vaccine		22-Oct-2022	Killed				VET-P 991234	NY-010887
<b>1</b> Rabies Vaccine							22-Oct-2023	

Vet Signature:

**Dr. Michelle Lugones**

Date: 10/22/2022 1:19:00 PM





USA SERVICE DOG  
REGISTRATION

SERVICE ANIMAL TYPES ▾ STORE ▾ SUPPORT ▾ REVIEWS ▾

CALL OR TEXT NOW! 160-293-783

REGISTRATION 1000UP

LOGIN

MY ACCOUNT

Print

HANDLER INFO

Akaninyene Elk  
1923 McDonald avenue #167, Brooklyn,  
NY, 11223  
Email:  
polyphonicsystems@gmail.com  
Phone: 2135630546

REGISTERED ANIMALS

Animal #: Vellee  
Breed: Rottweiler  
Type: Service Dog

Handler: Akaninyene Elk  
1923 McDonald avenue #167,  
Brooklyn, NY, 11223  
polyphonicsystems@gmail.co  
m | 2135630546

Registration: 1009076684  
Services: Medical Alert  
Training Status: My Dog is  
Trained Service animal!

I have hearing letter quest.  
How to make my dog fast.  
Forgot my registration info.

Certificate #: U-000010018-F

Page 1 of 2



## BRONX CRIMINAL COURT

265 E 161 Street, Bronx, NY 10451

**FEE**  
 Non-Public  
 Version

Court ORI: NY062033J

The People of the State of New York  
 vs.  
**Akaniyene W. Etuk**

**Certificate of Disposition**  
 Docket Number: **CR-020431-23BX**

CJTN: **70425074M**  
 NYSID: **16037193M**

Defendant DOB: **01/08/1977**Arrest Date: **08/30/2023**Arraignment Date: **09/19/2023**

THIS IS TO CERTIFY that the undersigned has examined the files of the Bronx Criminal Court concerning the above entitled matter and finds the following:

Count #	Charge	Charge Weight	Disposition	Disposition Date
1	PL 205.30 AM Resisting Arrest **SEALED 160.50**	AM	Dismissed (Speedy Trial (CPL 170.30 (1)(e)), Sealed 160.50)	01/03/2024
2	PL 140.10 0A BM Crim Trespass 3rd:Enclsd Prop **SEALED 160.50**	BM	Dismissed (Speedy Trial (CPL 170.30 (1)(e)), Sealed 160.50)	01/03/2024
3	PL 140.05 V Trespass **SEALED 160.50**	V	Dismissed (Speedy Trial (CPL 170.30 (1)(e)), Sealed 160.50)	01/03/2024
4	PL 240.20 01 V Dis/Con;Fight/Violent Behavior **SEALED 160.50**	V	Dismissed (Speedy Trial (CPL 170.30 (1)(e)), Sealed 160.50)	01/03/2024

Charge Weight Key: I=Infraction; V=Violation; AM, BM=Class Misdemeanor; UM=Unclassified Misdemeanor; AF, BF, CF, DP, EF=Class Felony

Dated: January 19, 2024

Chief Clerk/Court Clerk

**CAUTION: THIS DOCUMENT IS NOT OFFICIAL UNLESS EMBOSSED WITH THE COURT SEAL**

All marijuana convictions under PL 221.05, PL 221.10, PL 221.15, PL 221.20, PL 221.35 or PL 221.40—including any appearing on this certificate of disposition—are vacated, dismissed, sealed, and expunged. It is an unlawful discriminatory practice for any entity to make any inquiry about such an expunged conviction or to use such an expunged conviction adversely against an individual in any form of application or otherwise—unless specifically required or permitted to do so by statute. It shall be an unlawful discriminatory practice, unless specifically required or permitted by statute, for any person, agency, bureau, corporation or association, including the state and any political subdivision thereof, to make any inquiry about, whether in any form of application or otherwise, or to act upon adversely to the individual involved, any arrest or criminal accusation of such individual not then pending against that individual which was followed by a termination of that criminal action or proceeding in favor of such individual, as defined in subdivision two of section 160.50 of the criminal procedure law, or by an order adjourning the criminal action in contemplation of dismissal, pursuant to section 170.55, 170.56, 210.46, 210.47, or 215.10 of the criminal procedure law, or by a youthful offender adjudication, as defined in subdivision one of section 720.35 of the criminal procedure law, or by a conviction for a violation sealed pursuant to section 160.55 of the criminal procedure law or by a conviction which is sealed pursuant to section 160.59 or 160.58 of the criminal procedure law, in connection with the licensing, housing, employment, including volunteer positions, or providing of credit or insurance to such individual; provided, further, that no person shall be required to divulge information pertaining to any arrest or criminal accusation of such individual not then pending against that individual which was followed by a termination of that criminal action or proceeding in favor of such individual, as defined in subdivision two of section 160.50 of the criminal procedure law, or by an order adjourning the criminal action in contemplation of dismissal, pursuant to section 170.55 or 170.56, 210.46, 210.47 or 215.10 of the criminal procedure law, or by a youthful offender adjudication, as defined in subdivision one of section 720.35 of the criminal procedure law, or by a conviction for a violation sealed pursuant to section 160.55 of the criminal procedure law, or by a conviction which is sealed pursuant to section 160.58 or 160.59 of the criminal procedure law. An individual required or requested to provide information in violation of this subdivision may respond as if the arrest, criminal accusation, or disposition of such arrest or criminal accusation did not occur. The provisions of this subdivision shall not apply to the licensing activities of governmental bodies in relation to the regulation of guns, firearms and other deadly weapons or in relation to an application for employment as a police officer or peace officer as those terms are defined in subdivisions thirty-three and thirty-four of section 1.20 of the criminal procedure law; provided further that the provisions of this subdivision shall not apply to an application for employment or membership in any law enforcement agency with respect to any arrest or criminal accusation which was followed by a youthful offender adjudication, as defined in subdivision one of section 720.35 of the criminal procedure law, or by a conviction for a violation sealed pursuant to section 160.55 of the criminal procedure law, or by a conviction which is sealed pursuant to section 160.58 or 160.59 of the criminal procedure law. For purposes of this subdivision, an action which has been adjourned in contemplation of dismissal, pursuant to section 170.55 or 170.56, 210.46, 210.47 or 215.10 of the criminal procedure law, shall not be considered a pending action, unless the order to adjourn in contemplation of dismissal is revoked and the case is restored to the calendar for further prosecution. [Executive Law 296(16)]

Charges may not be the same as the original arrest charges.

**B. Defendant Information**

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

See ATTACHED

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 2:

First Name

Last Name

See ATTACHED

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 3:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 4:

*See Attached*

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

### III. STATEMENT OF CLAIM

Place(s) of occurrence: \_\_\_\_\_

Date(s) of occurrence: \_\_\_\_\_

#### FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

*See Attached*

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## **INJURIES:**

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received. 

you required and received.

#### IV. RELIEF

State briefly what money damages or other relief you want the court to order.

or other relief you want the court to order.

*ATTACHED*

*get*

## V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IPP application.

Dated	<u>08/14/2024</u>		Plaintiff's Signature
First Name	<u>AKANIYONE</u>	Middle Initial	<u>W</u>
Street Address	<u>2409 ATLANTIC AVENUE #04</u>		
County, City	<u>BROOKLYN</u>	State	<u>NY</u>
Telephone Number	<u>929 676 -0970</u>		
		Email Address (if available)	

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

Yes    No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.



**United States District Court  
Southern District of New York**

## **Pro Se (Nonprisoner) Consent to Receive Documents Electronically**

Parties who are not represented by an attorney and are not currently incarcerated may choose to receive documents in their cases electronically (by e-mail) instead of by regular mail. Receiving documents by regular mail is still an option, but if you would rather receive them only electronically, you must do the following:

1. Sign up for a PACER login and password by contacting PACER<sup>1</sup> at [www.pacer.uscourts.gov](http://www.pacer.uscourts.gov) or 1-800-676-6856;
2. Complete and sign this form.

If you consent to receive documents electronically, you will receive a Notice of Electronic Filing by e-mail each time a document is filed in your case. After receiving the notice, you are permitted one "free look" at the document by clicking on the hyperlinked document number in the e-mail.<sup>2</sup> Once you click the hyperlink and access the document, you may not be able to access the document for free again. After 15 days, the hyperlink will no longer provide free access. Any time that the hyperlink is accessed after the first "free look" or the 15 days, you will be asked for a PACER login and may be charged to view the document. For this reason, *you should print or save the document during the "free look" to avoid future charges.*

### **IMPORTANT NOTICE**

Under Rule 5 of the Federal Rules of Civil Procedure, Local Civil Rule 5.2, and the Court's Electronic Case Filing Rules & Instructions, documents may be served by electronic means. If you register for electronic service:

1. You will no longer receive documents in the mail;
2. If you do not view and download your documents during your "free look" and within 15 days of when the court sends the e-mail notice, you will be charged for looking at the documents;
3. This service does *not* allow you to electronically file your documents;
4. It will be your duty to regularly review the docket sheet of the case.<sup>3</sup>

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<sup>1</sup> Public Access to Court Electronic Records (PACER) ([www.pacer.uscourts.gov](http://www.pacer.uscourts.gov)) is an electronic public access service that allows users to obtain case and docket information from federal appellate, district, and bankruptcy courts, and the PACER Case Locator over the internet.

<sup>2</sup> You must review the Court's actual order, decree, or judgment and not rely on the description in the email notice alone. See ECF Rule 4.3

<sup>3</sup> The docket sheet is the official record of all filings in a case. You can view the docket sheet, including images of electronically filed documents, using PACER or you can use one of the public access computers available in the Clerk's Office at the Court.

500 PEARL STREET | NEW YORK, NY 10007  
300 QUARROPAS STREET | WHITE PLAINS, NY 10601

PRO SE INTAKE UNIT: 212-805-0175

## **CONSENT TO ELECTRONIC SERVICE**

I hereby consent to receive electronic service of notices and documents in my case(s) listed below. I affirm that:

1. I have regular access to my e-mail account and to the internet and will check regularly for Notices of Electronic Filing;
2. I have established a PACER account;
3. I understand that electronic service is service under Rule 5 of the Federal Rules of Civil Procedure and Rule 5.2 of the Local Civil Rules, and that I will no longer receive paper copies of case filings, including motions, decisions, orders, and other documents;
4. I will promptly notify the Court if there is any change in my personal data, such as name, address, or e-mail address, or if I wish to cancel this consent to electronic service;
5. I understand that I must regularly review the docket sheet of my case so that I do not miss a filing; and
6. I understand that this consent applies only to the cases listed below and that if I file additional cases in which I would like to receive electronic service of notices of documents, I must file consent forms for those cases.

**Civil case(s) filed in the Southern District of New York:**

Please list all your pending and terminated cases to which you would like this consent to apply. For each case, include the case name and docket number (for example, John Doe v. New City, 10-CV-01234).

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Name (Last, First, MI)

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Address	City	State	Zip Code
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Telephone Number	E-mail Address
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Date	Signature
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